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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

TRI-UNION SEAFOODS, LLC,

Plaintiff,

v.

STARR SURPLUS LINES INSURANCE  
COMPANY,

Defendant.

CASE NO. 14-cv-2282-MMA-MDD

**JOINT NOTICE OF SETTLEMENT IN  
PRINCIPLE AND JOINT MOTION TO  
STAY PROCEEDINGS**

Judge: Hon. Michael M. Anello  
Location: Courtroom 3A ( Schwartz)

Magistrate: Hon. Mitchell D. Dembin  
Location: 11th Floor (Annex)

**JOINT NOTICE OF SETTLEMENT IN PRINCIPLE  
AND JOINT MOTION TO STAY PROCEEDINGS**

TO THE HONORABLE COURT:

PLEASE TAKE NOTICE THAT Plaintiff Tri-Union Seafoods, LLC ("Tri-Union") and Defendant Starr Surplus Lines Insurance Company ("Starr") (collectively, "Parties") have reached a settlement in principle of their disputes that are the subject of this action;

WHEREAS, the Parties have been engaged in settlement discussions;

WHEREAS, through those discussions, the Parties have reached a settlement in principle of their disputes that are the subject of this action, subject to agreement upon final terms, and have paused their discovery efforts; and

WHEREAS, the Parties wish to avoid burdening the Court and its staff and incurring expenses in this litigation while the Parties continue to discuss settlement-related issues.

Based on the foregoing, the Parties hereby jointly request that the Court stay the proceedings in this action through and including January 15, 2016, and in connection therewith, the Parties hereby jointly request that the Court take the December 18, 2015 Mandatory Settlement Conference ("MSC") and all related deadlines off calendar.

Good cause exists for the requested stay, including taking the MSC and all related deadlines off calendar. The Parties expect to finalize a settlement of their disputes that are the subject of this action within approximately the next month, and wish to avoid unnecessary expenditure of resources in connection with this litigation while they focus their efforts on attempting to finalize such a settlement.

This Joint Motion to Stay Proceedings is unopposed and no party will be prejudiced by the relief requested herein.

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